

## **REMARKS**

The Final Office Action of May 4, 2005, rejected all pending claims (1-16). Claims 1-16 have been cancelled and new claims 17-32 have been added to this amendment. Applicants respectfully request reconsideration of the rejections.

### **Claim Rejections under 35 USC §102**

The Final Office Action rejected claims 1, 5, 8, 12 and 16 under 35USC §102(a) as anticipated by Int. Pub. No. WO 00/46667 to Schwabe (hereafter, Schwabe). Claim 17 is generally equivalent to cancelled claim 1, except that claim 17 includes the limitation that the mapping is done by using a hash function. Original claim 2 required a hash function and the Final Office Action conceded that Schwabe does not disclose such use of a hash function. Therefore, new claim 17 is not anticipated by Schwabe.

New claim 24 is substantially a method counterpart of claim 17 and new claim 29 is substantially a computer-readable medium counterpart of claim 17, and therefore these claims are also not anticipated by Schwabe.

### **Claim Rejections under 35 USC §103**

In the Final Office Action, the Examiner rejected original claims 2-4, 6, 7, 9-11 and 13-15 under 35 U.S.C. 103(a) as being unpatentable over Schwabe in view of U.S. Pat. No. 5,764,987 (Eidt). The Applicant respectfully submits that all of the new claims patently distinguish over the cited references. Independent claims 17, 24, and 29 all require the use of a function to map symbolic linking strings to linking identifiers. Nothing in the combination of

cited references teaches, suggests or motivates these limitations. The Final Office Action contends that one skilled in the art would use the hash function of Eidt to map symbolic linking strings to linking identifiers or tokens because "hashing the export symbols considerably increases the speed of searching for and importing the symbols." However, increasing speed is not the function of the hash function of claims 17, 24 and 29. In determining obviousness, the claims must be considered as a whole and that means that the problem solved by the invention must be considered. Determination of obviousness cannot be based on the hindsight combination of components selectively culled from the prior art to fit the parameters of the patented invention. ATD Corp. v. Lydall, Inc., 159 F.3d 534, 546, 48 USPQ2d 1321, 1329 (Fed. Cir. 1998). There must be a teaching or suggestion within the prior art, within the nature of the problem to be solved, or within the general knowledge of a person of ordinary skill in the field of the invention, to look to particular sources, to select particular elements, and to combine them as combined by the inventor. See Ruiz v. A.B. Chance Co., 234 F.3d 654, 665, 57 USPQ2d 1161, 1167 (Fed. Cir. 2000); ATD Corp., 159 F.3d at 546, 48 USPQ2d at 1329; Heidelberger Druckmaschinen AG v. Hantscho Commercial Prods., Inc., 21 F.3d 1068, 1072, 30 USPQ2d 1377, 1379 (Fed. Cir. 1994) ("When the patented invention is made by combining known components to achieve a new system, the prior art must provide a suggestion or motivation to make such a combination.").

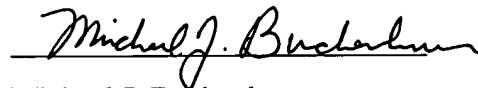
The problem solved by applicant's invention is to use a less space-consuming expression of symbolic linking strings. See paragraph 0012 of the subject patent application. Eidt is not concerned at all with consuming less storage space. In fact, Eidt uses an Export Chain Table and an Export Symbol table that consumes substantial amounts of storage space and is thus not

suitable for reducing storage space (the problem addressed by applicants' invention). Therefore, those skilled in the art would not have been motivated to use the storage-space consuming approach of Eidt in a system such as Schwabe's.

Claims 18-23, 25-28 and 30-32 are dependent on their respective independent claims and are patentable for at least the same reasons discussed herein.

For the foregoing reasons, Applicant respectfully requests entry of the amendment and allowance of the pending claims.

Respectfully submitted,



Michael J. Buchenhorner

Reg. No. 33,162

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HOLLAND & KNIGHT LLP  
Holland & Knight LLP  
701 Brickell Avenue, Suite 3000  
Miami, FL 33131  
(305) 789-7773 (voice)  
(305) 789-7799 (fax)

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I hereby certify that this Amendment and Response to Office Action, and any documents referred to as attached therein, are being deposited with the United States Postal Office with sufficient postage as first-class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450.



Michael J. Buchenhorner

Date: August 4, 2005.

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